

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

DAVID SAMBRANO, individually, and
on behalf of all others similarly situated, §
Plaintiffs, §
v. §
UNITED AIRLINES, INC., §
Defendant. §

§ Civil Action No.
§ 4:21-CV-01074-P-BJ

**UNOPPOSED MOTION TO CONTINUE HEARING ON DEFENDANT'S
AMENDED MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Defendant United Airlines, Inc. ("United") files its Unopposed Motion to Continue Hearing on Defendant's Amended Motion to Compel Production of Documents and in support thereof, states as follows:

1. On July 25, 2023, the U.S. Magistrate Judge issued his order setting for hearing on Defendant's Amended Motion to Compel the Production of Documents on August 10, 2023.

See ECF No. 193.

2. On August 10, 2023, the undersigned counsel for United will be out of the country and unable to attend the hearing.

3. Counsel for United conferred with counsel for Plaintiffs about his inability to attend the hearing on August 10, 2023, and Plaintiffs' counsel do not oppose a continuance of the hearing. **All counsel necessary to attend this hearing are available on August 30, 2023.**

4. In this case, good cause exists for continuing the hearing the Defendant's Amended Motion to Compel the Production of Documents as it would allow both Parties to adequately prepare for and have the counsel of their choice attend and argue at the hearing. This

continuance is not sought in an effort to delay, prejudice opposing counsel, or otherwise inconvenience the Court.

5. For these reasons, United requests that this Court continue its hearing the Defendant's Amended Motion to Compel the Production of Documents to August 30, 2023.

Respectfully submitted,

/s/ Russell D. Cawyer

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**ATTORNEYS FOR DEFENDANT
UNITED AIRLINES, INC.**

CERTIFICATE OF CONFERENCE

On July 24, 2023, counsel for United conferred with John Sullivan, counsel for the Plaintiffs, concerning the relief requested in this Motion and Mr. Sullivan stated that the Plaintiffs were not opposed to the relief requested herein.

/s/ *Russell D. Cawyer*
Russell D. Cawyer

CERTIFICATE OF SERVICE

On July 25, 2023 I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ *Russell D. Cawyer*
Russell D. Cawyer